

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Southern District of Georgia

United States of America

v.

Bryan S. Stills

*Defendant(s)*

Case No.

1:19-mj-48

FILED  
U.S. DISTRICT COURT  
AUGUSTA DIV.

2019 OCT -2 AM 10:41

CLERK *Burton*  
SO. DIST. OF GA.

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of Ocotober 1, 2019 in the county of Richmond in the  
Southern District of Georgia, the defendant(s) violated:*Code Section*18 U.S.C. 2252  
18 U.S.C. 2252A*Offense Description*Certain activities relating to material involving the sexual exploitation of  
minors  
Certain activities relating to material constituting or containing child  
pornography

This criminal complaint is based on these facts:

Please see the attached Affidavit of Special Agent Richard Starnes, which is incorporated by reference as if fully set  
forth herein.☒ Continued on the attached sheet.*Complainant's signature*

Richard Starnes, Special Agent CID

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

10/2/2019*Judge's signature*

City and state:

Augusta, GA

Brian K. Epps, United States Magistrate Judge

*Printed name and title*

**AFFIDAVIT**

I, Richard B. Starnes, a Special Agent with the U.S. Army Criminal Investigation Division, Major Cybercrime Unit-South, being duly sworn, hereby depose and state the following is true and correct to the best of my knowledge and belief:

**INTRODUCTION AND AGENT BACKGROUND**

1. Beginning at a time unknown to the Grand Jury but at least on or about October 1, 2019, in Richmond County, within the Southern District of Georgia, the defendant,

**BRYAN S. STILLS,**

did knowingly possess child pornography as defined in Title 18, United States Code, Section 2252(8)(A), that is, any visual depiction of a minor, any person under 18 years old, engaged in sexually explicit conduct, one or more of such images depicting a prepubescent minor or any person under 12 years old engaged in sexually explicit conduct said images having been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

**All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).**

2. I am a Special Agent (“SA”) with the Major Cybercrime Unit (“MCU”), U.S. Army Criminal Investigation Command (“USACIDC”), and have been so employed since April 2015. The primary mission of the MCU is to investigate computer-related offenses including child pornography, extortion, computer intrusions, denial of service attacks and other types of malicious computer activity directed against the U.S. Army or conducted using Army computers. As a Special Agent of USACIDC, I am authorized to investigate crimes involving all violations of the Uniform Code of Military Justice, and other applicable federal and state laws where there is an Army interest. I have successfully completed the U.S. Army Criminal Investigation Division’s Special Agent Course located at the U.S. Army Military Police School, Fort Leonard Wood, MO, which is a federally accredited criminal investigator training program. During my training at the Special Agent Course, I received legal instruction and advanced formal training on a variety of criminal investigations, including the use of the U.S. Army Criminal Investigation Division in furtherance of criminal activity such as identity theft, mail fraud, bank fraud, extortion, child pornography and other related offenses. I have completed the Network Intrusion Basics Course, Introduction to Networks and Hardware, Computer Incident Response Course, and the Windows Forensic Examiner Course through the Defense Cyber Investigations Training Academy (“DCITA”). I have also completed the Digital Evidence Acquisition Specialist Program and the Vehicle

Data Extraction Training Program, which are federally accredited training programs located at the U.S. Federal Law Enforcement Training Center. Additionally, I have completed CID Special Agent courses that include the Special Victims Training Program, the Criminal Intelligence Training Program, Hostage/Crisis Negotiator Level One Training Course, the U.S. Army Special Forces Technical Exploitation Course, and the BATF Level One Post-Blast Investigation Course. Prior to my position with MCU, I was employed as a Police Officer with the Charlotte-Mecklenburg Police Department for approximately thirteen years where I obtained my basic and advanced law enforcement certificates for the State of North Carolina. My duties as an officer included the investigation and enforcement of criminal laws in the State of North Carolina. Additionally, I have served as a U.S. Army Reserve CID Special Agent since 2009. My duties as a reserve U.S. Army CID Special Agent included investigating general crimes (to include but not limited to murder, sexual assaults, various forms of fraud and related offenses) as well as conducting technical sensitive site exploitation in the war on terror. I hold an A.A.S. in Logistics from the Community College of the Air Force, a B.A. in Criminal Justice from UNC-Charlotte, a B.S. in Emergency Management from Western Carolina University, a M.S. in Security Studies from East Carolina University, and a Master's Executive Certificate in Negotiations from the University of Notre Dame.

3. Pursuant to Title 18, United States Code Section 2258A, a provider of electronic communication services or remote computing services to the public through a means or facility of interstate commerce, such as the internet, shall report incidents of apparent violations of child exploitation statutes to the CyberTipline of the National Center for Missing and Exploited Children (NCMEC). Such a report may include the pornographic image(s) and other identifying or descriptive information.

4. Google Inc. ("Google") is a company that provides technology and services to consumer and business customers, including email services known as Gmail.

5. On September 13, 2019, Google, headquartered at 1600 Amphitheatre Parkway, Mountain View, CA 94043, submitted Cybertipline Reports #53531291 and #534596689 to the NCMEC.

6. The incident types were: Apparent Child Pornography (unconfirmed), and the incident times listed as: #53531291 13 August 2019 UTC 13:40:45, #53459689 11 August 2019 UTC 02:17:44.

7. On September 18, 2019, your affiant was contacted by Special Agent Brett Eckert, U.S. Army Criminal Investigation Command (USACIDC). SA Eckert serves as the Criminal Investigation Division Liaison to NCMEC.

8. SA Eckert informed your affiant that the Google Legal Team submitted two CyberTipline Reports to NCMEC on August 11 and August 13, 2019.

9. Google also uploaded the files in connection with the two CyberTipline reports, the content of which NCMEC did not review. The report indicated Google did not review the content of the files.

10. Google reported that four files of apparent child pornography were detected during uploads from the email account bryanstills.wphs@gmail.com from the Internet Protocol (IP) 165.166.221.98.

11. Based on my training and experience, your affiant knows that the additional information the ESP provider gave means the files were detected through an automated file hash comparison mechanism. The digital file was apparent child pornography based on the “hash value” of the file.

12. Your affiant knows through training and experience that a “hash value” is like a digital fingerprint. It is produced when a digital image is analyzed using a complex mathematical algorithm. Every time a particular file or image is processed using the algorithm, the resulting hash value will be the same. If the file or image is altered in any way, even slightly, analysis through the algorithm will produce an entirely different hash value. Thus, a hash value is essentially an identification number for a specific file. Once a file’s hash value is identified by a service provider, like Google, as matching the hash value of an image previously

identified as or suspected as being an image of child pornography, Google's identification system will be alerted when the file is uploaded or downloaded to or from Google's servers, and a report of the incident is submitted to NCMEC.

13. The CyberTips revealed that a user with the email address "bryanstills.wphs@gmail.com" and phone number 267-276-2205 uploaded the images to Google Gmail.

14. IP addresses for the mobile phone 267-276-2205 resolve to areas around and on Fort Gordon, GA.

15. The Google Gmail account, bryanstills.wphs@gmail.com, was accessed on a Department of Defense IP address on February 27, 2019.

16. Other identified logins to Google Gmail, identified from the CyberTips, for this account were accessed via the mobile carrier, T-Mobile USA, belonging to the aforementioned phone number, 267-276-2205.

17. Your affiant conducted a search in the Department of Defense Personnel Search (DPS), which is the Army database for all Department of Defense (DoD) personnel. This search revealed that the name Bryan Stills was a positive match for a person named Bryan Stills who is currently stationed at Fort Gordon, GA. No phone or email information for Mr. Stills was located in the search of DPS.

18. Your affiant made contact with Private (PV2) Stills', Captain (CPT) Bivens, Delta Company Commander, 369<sup>th</sup> Signal Battalion, who stated she has a

PV2 Bryan Stills in her ranks. Stills is listed as a student in Advanced Individual training for communications. The 369<sup>th</sup> Signal battalion is a training battalion located on Fort Gordon, GA.

19. Your affiant requested PV2 Stills' contact information from CPT Bivens. CPT Bivens provided 267-276-2205 as PV2 Stills' phone number on record with her battalion. 267-276-2205 is the same phone number identified in both CyberTips from Google as uploading suspected child pornography to [bryanstills.wphs@gmail.com](mailto:bryanstills.wphs@gmail.com).

20. On September 27, 2019, the Honorable Brian K. Epps authorized a search warrant for the premises where STILLs was being housed with the 369<sup>th</sup> battalion, Room 219, Building 29705, 455 B Street, Fort Gordon, GA 30905. The search warrant authorized a search for items that constitute the commission of, contraband, the fruits of crime, or instrumentalities of violations of Title 18, United States Code, Sections 2251, 2252 and 2252A, Distribution and Possession of Child Pornography

21. On October 1st, 2019, a search warrant was executed at Room 119, Building 29705, 455 B Street, Fort Gordon, GA 30905. During the search of this premises, your affiant was able to located two cellular telephones and one laptop computer.

22. On October 1st, 2019, PV2 Stills admitted the following to your affiant:



- a. that he received images of child pornography on several occasions, around August of 2019, unsure of the exact dates;
- b. he utilized his cell phone to obtain the images and, in turn, saved the images to his phone;
- c. he then emailed the images to himself from the cell phone using Google Gmail account bryanstills.wphs@gmail.com;
- d. he verified bryanstills.wphs@gmail.com; as his own email address; and
- e. he verified his phone number to be 267-276-2205.

23. Both the phone number and the email address belonging to PV2 Stills matched the information reported in the CyberTips reported by Google to NCMEC.

24. On October 1, 2019, your affiant conducted a forensic preview of the device assigned to the phone number 267-276-2205 and belonging to PV2 Stills. Your affiant observed approximately 453 images of sexual acts involving minors, 62 videos of suspected child pornography (.gifs), 258 images of suspected child pornography (screenshots of websites and multiples images combined into one .jpg), and 56 images of suspected child pornography with persons of questionable age.

25. The following list is a sample of images found on the cellular device assigned to the phone number 267-276-2205:

- a. Example #1: six to eight years old female minor being vaginally penetrated by the penis of an adult while male;

- b. Example #2: white female approximately eight years of age with legs spread open with what appears to be semen coming from her vagina; and
- c. Example #3: white female approximately eight years of age being penetrated vaginally by an adult white male using a sexual toy.

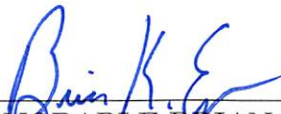
Respectfully submitted,



---

Richard B. Starnes  
Special Agent  
U.S. Army CID MCU-South

Subscribed and sworn to before me on 10/2/2019, 2019.



---

HONORABLE BRIAN K. EPPS  
UNITED STATES MAGISTRATE JUDGE